

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO: _____
v.	:	DATE FILED: _____
ROGER LEE PARIS	:	VIOLATIONS:
	:	18 U.S.C. § 157(1) (bankruptcy fraud
	:	- 2 counts)
	:	18 U.S.C. § 157(3) (bankruptcy fraud
	:	- 1 count)
	:	18 U.S.C. § 152(3) (false bankruptcy
	:	declaration - 1 count)
	:	18 U.S.C. § 2 (aiding and abetting)
	:	

INDICTMENT

COUNTS ONE AND TWO

THE GRAND JURY CHARGES THAT:

BACKGROUND

At all times material to this indictment:

1. In or about April 2007, defendant ROGER LEE PARIS purchased a residential property located on Morgan Lane in Glenside, Pennsylvania (the "Glenside property") with the assistance of a \$430,000 mortgage loan from a bank.
2. From at least 2009 through 2019, defendant ROGER LEE PARIS did not make payments of principal, interest, and property taxes owed on the Glenside property, as required by his loan agreement and local law.
3. At various times between 2009 through 2019, the lenders on the Glenside property sought to foreclose on and sell the Glenside property to satisfy defendant ROGER LEE PARIS' growing debt.

4. On or about July 22, 2014, one of defendant ROGER LEE PARIS' lenders, Nationstar Mortgage LLC ("Nationstar Mortgage"), obtained a \$667,573.38 judgment against defendant PARIS, following a civil complaint in mortgage foreclosure.

5. As a result of the various foreclosure judgments issued against defendant ROGER LEE PARIS, the Montgomery County, Pennsylvania Sheriff's Department listed the Glenside property for sheriff's sale on multiple occasions between 2014 and 2019.

6. From in or about December 2014 through in or about September 2019, defendant ROGER LEE PARIS filed or caused to be filed five different bankruptcy petitions under Title 11, all in the United States Bankruptcy Court for the Eastern District of Pennsylvania, and all of which used the address of the Glenside property. All five bankruptcy actions were subsequently dismissed, as summarized in the chart below:

Petition Date	Case Number	District	Listed Filer	Listed Residence	Disposition
12/09/14	14-19682	E.D. Pa.	ROGER LEE PARIS	Glenside property	Dismissed on 03/31/15 for failure to make any plan payments
10/30/18	18-17142	E.D. Pa.	ROGER LEE PARIS	Glenside property	Dismissed on 11/19/18 for failure to file required documents
02/25/19	19-11136	E.D. Pa.	ROGER LEE PARIS	Glenside property	Dismissed on 03/13/19 for failure to file required documents
07/26/19	19-14689	E.D. Pa.	N.P.	Glenside property	Dismissed on 08/14/19 for failure to file required documents
09/20/19	19-15905	E.D. Pa.	A.M.	Glenside property	Dismissed on 10/08/19 for failure to file required documents

7. These five bankruptcy petitions filed or caused to be filed by defendant ROGER LEE PARIS delayed the scheduled foreclosure and sheriff's sales of the Glenside property.

8. On or about March 27, 2019, the United States Bankruptcy Court for the Eastern District of Pennsylvania issued an order barring defendant ROGER LEE PARIS from filing another bankruptcy petition for a period of twelve months.

9. On or about April 15, 2019, the Montgomery County Prothonotary issued a writ of execution directing the Montgomery County Sheriff's Department to sell the Glenside property to satisfy the \$864,057.83 judgment and interest owed by defendant ROGER LEE PARIS to one of his lenders, U.S. Bank National Association ("U.S. Bank"), following a civil complaint in mortgage foreclosure.

10. Defendant ROGER LEE PARIS' Glenside property was scheduled to be foreclosed in a sheriff's sale by the Montgomery County Sheriff's Department on or about July 31, 2019, among other occasions.

THE SCHEME

11. From in or about December 2014 through in or about November 2019, in the Eastern District of Pennsylvania and elsewhere, defendant

ROGER LEE PARIS

devised and intended to devise a scheme to defraud the mortgagees of the Glenside property, Nationstar Mortgage and U.S. Bank, of their legal right to sell the Glenside property to satisfy their judgments by delaying and defeating scheduled sheriff's sales over a multi-year period.

12. To carry out the scheme, defendant ROGER LEE PARIS used, or caused to be used, the bankruptcy system, filings, and representations which concerned and related to proceedings under Title 11 of the United States Code.

MANNER AND MEANS

It was part of the fraud scheme that:

13. From in or about 2014 through in or about 2019, defendant ROGER LEE PARIS filed or caused the filing of multiple bankruptcy petitions under Title 11, all in the United States Bankruptcy Court for the Eastern District of Pennsylvania, and all which used the address of the Glenside property.

14. From in or about 2014 through in or about 2019, defendant ROGER LEE PARIS submitted or caused the submission of copies of these bankruptcy petitions to the Montgomery County Sheriff's Office to delay and defeat the scheduled foreclosures of the Glenside property.

15. After the United States Bankruptcy Court for the Eastern District of Pennsylvania issued an order in March 2019 barring defendant ROGER LEE PARIS from filing further bankruptcy petitions, defendant PARIS used third parties to file additional bankruptcy petitions which listed the Glenside property.

16. On or about July 26, 2019, five days prior to a scheduled sheriff's sale of the Glenside property, defendant ROGER LEE PARIS filed or caused the filing of a materially false and fraudulent bankruptcy petition in the United States Bankruptcy Court for the Eastern District of Pennsylvania, docket number 19-14689, in the name of N.P., which used the address of the Glenside property.

17. Three days later, on or about July 29, 2019, two days prior to a scheduled sheriff's sale of the Glenside property, defendant ROGER LEE PARIS submitted or caused the submission of a copy of the bankruptcy filing to the Montgomery County Sheriff's Office to delay and defeat the scheduled foreclosure of the Glenside property.

18. On or about September 20, 2019, five days prior to another scheduled sheriff's sale of the Glenside property, defendant ROGER LEE PARIS filed or caused the filing of a bankruptcy petition in the United States Bankruptcy Court for the Eastern District of Pennsylvania, docket number 19-15905, in the name of A.M., which used the address of the Glenside property.

19. From on or about September 20, 2019, to on or about September 24, 2019, defendant ROGER LEE PARIS altered or caused the alteration of the bankruptcy petition filed at docket number 19-15905 in the name of A.M. to make it look as if the petition had been filed in his own name.

20. On or about September 24, 2019, one day prior to the scheduled sheriff's sale of the Glenside property, defendant ROGER LEE PARIS submitted or caused the submission of an altered copy of the bankruptcy petition to the Montgomery County Sheriff's Department to delay and defeat the scheduled foreclosure of the Glenside property.

BANKRUPTCY PETITIONS

21. On or about each of the dates set forth in the chart below, in the Eastern District of Pennsylvania and elsewhere, for the purpose of executing and concealing this scheme and attempting to do so, defendant

ROGER LEE PARIS

filed, caused the filing of, and aided and abetted the filing of, petitions for bankruptcy under Title 11, United States Code, in the United States Bankruptcy Court for the Eastern District of Pennsylvania, with each filing constituting a separate offense:

COUNT	APPROXIMATE DATE OF PETITION FILING	DESCRIPTION OF PETITION
1	July 26, 2019	Bankruptcy Petition filed under the name of N.P. at the Robert N.C. Nix, Sr. Federal Courthouse in Philadelphia, Pennsylvania at docket number 19-14689
2	September 20, 2019	Bankruptcy Petition filed under the name of A.M. at the Robert N.C. Nix, Sr. Federal Courthouse in Philadelphia, Pennsylvania at docket number 19-15905

All in violation of Title 18, United States Code, Sections 157(1) and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 10 and 13 through 20 of Counts One and Two are incorporated here.

2. From in or about December 2014 through in or about November 2019, in the Eastern District of Pennsylvania and elsewhere, defendant

ROGER LEE PARIS

devised and intended to devise a scheme to defraud the mortgagees of the Glenside property, Nationstar Mortgage and U.S. Bank, of their legal right to sell the Glenside property to satisfy their judgments by delaying and defeating scheduled sheriff's sales over a multi-year period.

3. To carry out the scheme, defendant ROGER LEE PARIS used, or caused to be used, the bankruptcy system, filings, and representations which concerned and related to proceedings under Title 11 of the United States Code.

4. From on or about September 20, 2019, until on or about October 9, 2019, the bankruptcy case of A.M., captioned In re: A.M., Debtor was pending in the United States Bankruptcy Court for the Eastern District of Pennsylvania, with docket number 19-15905.

5. On or about September 24, 2019, in the Eastern District of Pennsylvania and elsewhere, for the purpose of executing and concealing this scheme and attempting to do so, defendant

ROGER LEE PARIS

made and aided and abetted the making of a false and fraudulent representation, claim, and promise, concerning and in relation to the bankruptcy proceeding captioned In re: A.M., Debtor

at docket number 19-15905, that is, defendant PARIS submitted or caused the submission of an altered copy of the bankruptcy petition to the Montgomery County Sheriff's Department to delay and defeat the scheduled foreclosure of the Glenside property.

In violation of Title 18, United States Code, Sections 157(3) and 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 10 and 13 through 20 of Counts One and Two are incorporated here.

2. On or about July 26, 2019, defendant ROGER LEE PARIS filed or caused to be filed in the United States Bankruptcy Court for the Eastern District of Pennsylvania a bankruptcy petition captioned In re: N.P., Debtor, docket number 19-14689.

3. On or about July 26, 2019, in the Eastern District of Pennsylvania and elsewhere, defendant

ROGER LEE PARIS,

in connection with bankruptcy docket number 19-14689, which is a case under Title 11 of the United States Code, knowingly and fraudulently made and aided and abetted the making of a material false declaration, certificate, and verification under the penalty of perjury, as permitted under Section 1746 of Title 28, by submitting and causing the submission of an "Official Form 101 Voluntary Petition for Individuals Filing for Bankruptcy" in the name of N.P. and signed under penalty of perjury by a person claiming to be N.P., but who in fact defendant PARIS knew was not N.P.

In violation of Title 18, United States Code, Sections 152(3) and 2.

A TRUE BILL:



Christine E. Ayala Long

**JACQUELINE C. ROMERO
UNITED STATES ATTORNEY**

No. _____

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

vs.

ROGER LEE PARIS, JR.

INDICTMENT

Counts

18 U.S.C. § 157(1) (bankruptcy fraud scheme – petition)

18 U.S.C. § 157(3) (bankruptcy fraud scheme – false representation)

18 U.S.C. § 152(3) (false bankruptcy declaration)

18 U.S.C. § 2 (aiding and abetting)

